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9 Attorneys for *Movant*
The Bank of New York Mellon F/K/A The Bank of New York as successor in interest to JP
Morgan Chase Bank, N.A. as Trustee for Nationstar Home Equity Loan Trust 2006-B

10
11 **UNITED STATES BANKRUPTCY COURT**

12 **DISTRICT OF NEVADA**

13 In re

14 ROBERT WAYNE NOKLEY AKA
NOKLEY GROUP LLC and KAREN
15 YVONNE NOKLEY,

16
17 Debtors.

Bankruptcy Case No. 18-15710-leb
Chapter 7

18
19 **THE BANK OF NEW YORK MELLON
F/K/A THE BANK OF NEW YORK AS
SUCCESSOR IN INTEREST TO JP
MORGAN CHASE BANK, N.A. AS
TRUSTEE FOR NATIONSTAR HOME
EQUITY LOAN TRUST 2006-B'S
NOTICE OF MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

20 **Hearing:**

Date: November 27, 2018
Time: 1:30 P.M.
Ctrm: 3

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23 TO: DEBTOR(S): ROBERT WAYNE NOKLEY, SR. and KAREN YVONNE NOKLEY
24 TO: ATTORNEY FOR DEBTOR(S): PRO SE
25 TO: TRUSTEE: LENARD E SCHWARTZER
26 TO: ALL PARTIES IN INTEREST

27 **NOTICE IS HEREBY GIVEN** that a Motion for Relief from the Automatic Stay
28 ("Motion") was filed on October 26, 2018, by Raymond Jerez, Esq., on behalf of *movant* The Bank

1 of New York Mellon F/K/A The Bank of New York as successor in interest to JP Morgan Chase
 2 Bank, N.A. as Trustee for Nationstar Home Equity Loan Trust 2006-B ("Movant") so that Movant
 3 may avail itself of applicable state law in foreclosing its security interest in the collateral. The real
 4 property is located at: 6391 Tempting Choice Avenue, Las Vegas, Nevada 89131. The motion seeks
 5 relief from stay on real property presently in possession of the Debtors herein. Any opposition must
 6 be filed pursuant to Local Rule 9014(d)(1).

7 **NOTICE IS FURTHER GIVEN** that if you do not want the court to grant the relief sought
 8 in the Motion, or if you want the court to consider your views on the Motion, then you must file an
 9 opposition with the court, and serve a copy on the person making the Motion ***no later than 14 days***
 10 prior to the hearing on the Motion. If the hearing date has been set on less than 14 days' notice, then
 11 the opposition must be filed and served ***no later than 5 business days*** before the hearing. The
 12 opposition must state your position, set forth all relevant facts and legal authority, and be supported
 13 by affidavits or declarations that conform to Local rule 9014(c).

14 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
 15 with the court. You *must* also serve your written response on the person who sent you this
 16 notice.

17 If you do not file a written response with the court, or if you do not serve your written
 18 response on the person who sent you this notice then:

- 19 ○ The court may *refuse to allow you to speak* at the scheduled hearing, and
- 19 ○ The court may *rule against you* without formally calling the matter at the hearing.

21 **NOTICE IS FURTHER GIVEN** that the hearing on the said Motion will be held before
 22 a United States Bankruptcy Judge, in the Foley Federal Building 300 Las Vegas Boulevard South
 23 Bankruptcy Courtroom Third Floor Las Vegas, Nevada on November 27, 2018 at the hour of
 24 1:30 P.M.

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SPECIAL NOTICE

In the event the provisions of the Federal Fair Debt Collection Practice Act are deemed applicable hereunder, please note that this communication is an attempt to collect a debt and any information obtained during the pendency hereof will be used for that purpose.

Unless you notify this office, in writing, within thirty (30) days after being served herewith, that you dispute the validity of the debt stated herein or any portion thereof, this office will assume that the subject debt is valid. If you notify this office, in writing, within thirty (30) days after being served herewith that you dispute the validity of the debt stated herein or any portion thereof, this office will obtain verification of the debt or obtain a copy of the judgment and mail the same to you. If you so request, in writing, that this office do so within thirty (30) days after being served herewith, this office will provide you with the name and address of the original creditor, if different from the current creditor.¹

Respectfully submitted,

ALDRIDGE PITE, LLP



RAYMOND JEREZA

Attorneys for Movant THE BANK OF NEW YORK MELLON F/K/A THE BANK OF NEW YORK AS SUCCESSOR IN INTEREST TO JP MORGAN CHASE BANK, N.A. AS TRUSTEE FOR NATIONSTAR HOME EQUITY LOAN TRUST 2006-B

Dated: October 26, 2018

¹Please take notice that this Motion has been set for hearing and served pursuant to governing Local Rules of Practice.